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May 5, 2014

VIA FEDEX NO. 8033 5794 7950

Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105

Re: Motor Carrier Application of Lyft, Inc.
Docket No.: A-2014-2415047

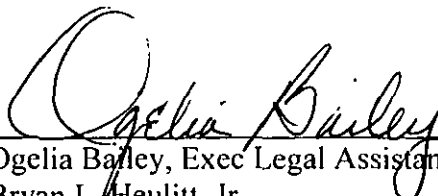
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MAY - 5 2014
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Secretary:

Enclosed herein please find the Philadelphia Parking Authority's (the "Authority") Petition To Intervene, relative to the above referenced matter.

If you have questions or concerns, please do not hesitate to contact me.

Sincerely,
The Philadelphia Parking Authority

By: 
Ogelia Bailey, Exec Legal Assistant for
Bryan L. Heulitt, Jr.
Associate General Counsel

BLH/ob

Enclosure

cc: Dennis G. Weldon, Jr., General Counsel
James P. Dougherty, Esquire (Via Fedex No. 8000 2777 1022)
Michael S. Henry, Esquire (Via Fedex No. 8684 8441 5598)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Motor Carrier Application of Lyft, Inc. :
: Docket No. A-2014-2415047
:

PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.71-5.75, The Philadelphia Parking Authority (the "Authority") by and through its undersigned counsel, hereby files this Petition to Intervene in the above-captioned proceeding, and in support thereof avers the following:

1. The Authority regulates all taxicab and limousines service in the City and County of Philadelphia pursuant to and as defined by statute. *See* 53 Pa. C.S. § 5701, *et seq.* (the "Act").

2. The applicant, Lyft, Inc. ("Lyft"), has met with the Authority in furtherance of providing its form of common carrier transportation services of passengers in Philadelphia. Therefore, the Authority is familiar with the type of passenger service proposed by Lyft.

3. As described to the Authority and as it appears in the application now before the Commission, Lyft seeks authorization from the Commission to provide its common carrier service to individuals in the entire Commonwealth, including Philadelphia.

4. The Authority believes that the proposed service will constitute either taxicab service or limousine service as defined by the Act. *See* 53 Pa. C.S. § 5701.

5. The Authority believes that Lyft has intentionally sought certification through the Commission in an attempt to impermissibly avoid applying for Philadelphia rights through the Authority.

6. The Authority believes that it is the only Commonwealth agency authorized to review an application of this nature within its Philadelphia jurisdiction.

7. The Authority believes that the approval of this application without consideration of jurisdictional issues may lead to conflicting regulatory enforcement, uncertainty for the applicant as to its service authorization within Philadelphia and public confusion.

8. The Authority believes that it merits inclusion in these proceedings as provided in 52 Pa. Code § 5.72 (b).

WHEREFORE, for all of the foregoing reasons, The Philadelphia Parking Authority respectfully requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in any and all proceedings instituted in connection with the above referenced application.

Respectfully submitted,
The Philadelphia Parking Authority

By: 

Dennis G. Weldon, Jr., ID No. 83976

Bryan L. Heulitt Jr., ID No. 204960

701 Market Street, Suite 5400

Philadelphia, PA 19106

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dweldon@philapark.org

Attorneys for the Authority

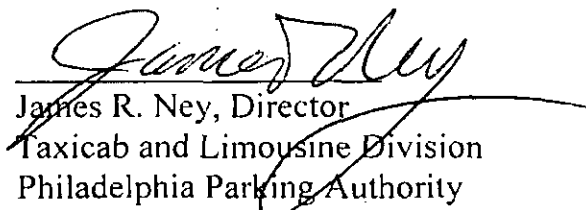
VERIFICATION

I, James Ney, hereby affirm that the facts and information set forth in the foregoing petition are true and correct to the best of my knowledge, information and belief and that this verification is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsifications to authorities.

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James R. Ney, Director
Taxicab and Limousine Division
Philadelphia Parking Authority

CERTIFICATE OF SERVICE

I, Bryan L. Heulitt, Jr., hereby certify that I have served the foregoing Petition to Intervene upon the following this 5th day of May, 2014 via overnight express package delivery service.

Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105

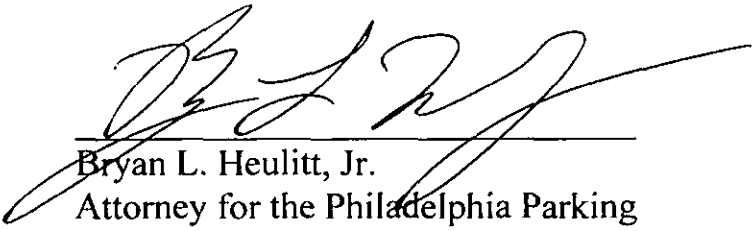
James P. Dougherty, Esquire
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
Attorney for Applicant

Michael S. Henry, Esquire
2336 S. Broad Street
Philadelphia, PA 19145
Attorney for Protestant

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SECRETARY'S BUREAU



Bryan L. Heulitt, Jr.
Attorney for the Philadelphia Parking
Authority

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FedEx Package Express **US Airbill**

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SP-1
Recipient's Copy

1 From
 Date 5 May 2014
 Sender's Name BLH, Inc, Assoc GEN Counsel Phone 215 683-9816
 Company PHILA PARKING AUTHORITY
 Address 701 MARKET ST STE 5400
 City PHILADELPHIA State PA ZIP 19106-1538

2 Your Internal Billing Reference

3 To Recipient's Name SECRETARY'S BUREAU Phone 717 772-7777
 Company Public Utility Commission
 Address 400 NORTH STREET
 City HARRISBURG State PA ZIP 17120
 0109052425

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 For packages over 150 lbs., use the
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 Earliest next business morning delivery to select
 locations. Friday shipments will be delivered on
 Monday unless SATURDAY Delivery is selected.

FedEx Priority Overnight
 Next business morning * Friday shipments will be
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 is selected.

FedEx Standard Overnight
 Next business afternoon.*
 Saturday Delivery NOT available

2 or 3 Business Days

FedEx 2Day A.M.
 Second business morning *
 Saturday Delivery NOT available

FedEx 2Day
 Second business afternoon.* Thursday shipments
 will be delivered on Monday unless SATURDAY
 Delivery is selected

FedEx Express Saver
 Third business day *
 Saturday Delivery NOT available

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FedEx Envelope* **FedEx Pak*** **FedEx Box** **FedEx Tube** **Other**

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No Signature Required
 Packages may be left without
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Direct Signature
 Someone at recipient's address
 must sign for delivery. Fee applies.

Indirect Signature
 If no one is available at recipient's
 address, someone at a neighboring
 address may sign for delivery. For
 residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?
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7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below. **Obtain recip. Acct. No.**

Sender Acct. No. in Section 7 will be billed. **Recipient** **Third Party** **Credit Card** **Cash/Check**

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